

November 11, 2022

VIA ELECTRONIC FILING

The Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, New York 10007

**Re: *Goldstein et al. v. Professional Staff Congress/CUNY et al.*,
Case No. 1:22-cv-00321-PAE**

Dear Judge Engelmayer:

This joint letter addresses the status of the claims in Count 3 of the Complaint, as required by the Court's order of November 4, 2022, ECF No. 79.

Three plaintiffs have the following claim for retroactive relief in the form of money damages (along with interest, attorneys' fees, and costs) against the following defendants:

- (1) Plaintiff Avraham Goldstein's claim for damages against Defendant PSC and Defendant City of New York under Count 3

Judgment has been entered, so payment to Plaintiff Goldstein is outstanding, and Plaintiff will move for attorneys' fees and costs by or on November 17, 2022. Once Plaintiff Goldstein is paid the amount of the judgment and the attorneys' fees and costs the Court determines he is due, he will no longer have a Count III claim against Defendant PSC.

- (2) Plaintiff Frimette Kass-Shraibman's and Plaintiff Mitchell Langbert's claims for damages against Defendant PSC under Count 3

Plaintiffs Kass-Shraibman and Langbert have live claims for money damages against Defendant PSC for dues and/or interest that they alleged were deducted from their wages after the date of their resignation from union membership.

There are no outstanding claims against State Defendants under Count 3.

Respectfully submitted,

s/ Nathan J. McGrath

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The Court appreciates this update from the parties.

SO ORDERED.

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PAUL A. ENGELMAYER
United States District Judge
November 14, 2022